IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

CANAL INDEMNITY COMPANY,)
Plaintiff,)
v.) CIVIL ACTION NO.: 2:05-cv-00778-MHT
WLS, INC. d/b/a S & H MOBILE HOMES, CAVALIER ACCEPTANCE CORP.; GREENTREE; RUTH BARRON; JOHN D. BARRON,))))
Defendants.	,)

ANSWER

COMES NOW the Defendant, WLS, Inc. d/b/a S & H Mobile Homes, and for answer to the Complaint for Declaratory Judgment filed by Canal Indemnity Company says as follows:

- 1. This Defendant denies each and every material averment of Plaintiff's Complaint and demands strict proof thereof.
 - 2. This Defendant pleads the general issue.
- 3. This Defendant says that Plaintiff's Complaint fails to state a claim upon which relief can be granted.
- 4. This Defendant says that it is owed defense and coverage under the Policy of Insurance issued by Canal Indemnity Company for the alleged acts and that same are covered under the Insurance Policy in question.
- 5. This Defendant says that the mental anguish alleged by the Plaintiff triggers coverage under the Canal Insurance Company Policy and Canal is not entitled to rescind it's Policy.

Jack J. Hall Jr. (ASB-0151/LX4J) Attorney for Defendant,

WLS, Inc d/b/a S & H Mobile Homes

OF COUNSEL:

HALL, CONERLY & BOLVIG, P.C. 1400 Financial Center 505 North 20th Street Birmingham, AL 35203 (205) 251-8143

CERTIFICATE OF SERVICE

I hereby certify I have on this day of September 2005, electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

William A. Austill, Esq. Joseph E. B. Stewart, Esq. AUSTILL, LEWIS & SIMMS, P.C. P. O. Box 11927 Birmingham, AL 35202-1927

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And I hereby certify that I have served the foregoing by U. S. Mail, first-class postage prepaid to the following non-CM/ECF participant:

Ruth Barron 637 U. S. HWY 139 Maplesville, AL 36750

Jack J. Hall, Jr.